



**SIMON CLEAR & ASSOCIATES
PLANNING AND DEVELOPMENT
CONSULTANTS**

**Statement of Response to
An Bord Pleanála Opinion**

Stage 3 Planning Application

Proposed Strategic Housing Development

**Castle Street,
Bray, Co. Wicklow**

Applicant: Silverbow Limited

April 2022

Simon Clear B.A. Dip. T.P. MIPI
Darran Quaile B.A. MRUP MSc BLUP MIPI
Paula Shannon B.A. MRUP MIPI

3 TERENCE ROAD WEST,
TERENURE,
DUBLIN 6W
D6W YY79,
IRELAND.

Phone: 00-353-1-492 5934
Fax: 00-353-1-492 7617
E-mail: admin@clearconsult.ie
Web: www.clearconsult.ie
Vat No. 9803199H

Introduction

The Pre-application Consultation Opinion from An Bord Pleanála in relation to the proposed Strategic Housing Development at Castle Street, Bray, Co. Wicklow was received on the 14th January 2022, case reference: ABP-311610-21.

The Opinion states that An Bord Pleanála *‘is of the opinion that the documents submitted with the request to enter into consultations constitute a reasonable basis for an application for strategic housing development.’*

Furthermore, the Opinion states that pursuant to Article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, specific information should be submitted with any application for permission.

This document lists the required information and explains how the requirements of the Opinion have been addressed in the planning application.

The Design Team referenced in this statement are:-

Simon Clear & Associates (SCA) – Planning Consultants

Henry J. Lyons (HJL) – Architects

Niall Montgomery & Partners (NMP) – Landscape Architects

Corrigan Hodnett Consulting (CHC) – Civil Engineering Consultants

NRB Consulting Engineers (NRB) – Transportation Consultants

IN2 Consulting (IN2) – Daylight / Sunlight Consultants

McElligott Consulting Engineers (MCE) – Lighting Consultants

Shanarc Archaeology – Archaeological Consultants

Enviroguide Consulting – Environmental Consultants

Dr Tina Aughney – Bat specialist

Aramark – Property Management Consultants

1. A detailed statement, which should provide adequate identification of all such elements and justification as applicable, where / if the proposed development materially contravenes the statutory plan or LAP for the area other than in relation to the zoning of the land, indicating why permission should, nonetheless, be granted, having regard to a consideration specified in section 37(2)(b) of the Act of 2000.

Response:

A *Material Contravention Statement* prepared by Simon Clear & Associates is submitted with the application.

2. A Housing Quality Assessment that provides details in respect of the proposed apartments set out as a schedule of accommodation, with the calculations and tables required to demonstrate compliance with the various requirements of the 2020 Guidelines on Design Standards for New Apartments. It is important that the proposal meets and preferably exceeds the minimum standards in terms of dual aspect and proportion of apartments which exceed the floor area by 10%. In the interests of clarity clear delineation / colour coding of floor plans indicating which of the apartments are considered by the applicant as dual / single aspect, single aspect north facing and which apartments exceeds the floor area by 10%.

Response:

A Housing Quality Assessment demonstrating compliance with the above requirements is included in the *HJL Architectural Design Statement* submitted with the application. The *Architectural Design Statement* (pages 34-35) also includes colour-coded floorplan diagrams demonstrating the units that are single / dual / triple aspect and single aspect north facing and the units that exceed the minimum floor area by 10%.

The proposal provides 63 no. dual/triple aspect units, which equates to 45%. This comfortably exceeds the minimum requirement of 33% for central urban locations.

All of the proposed units exceed minimum floor areas by 10% or more.

3. A Traffic and Transportation Impact Assessment.

Response:

The application is supported by a *Transportation Assessment Report* prepared by NRB.

The report includes:-

Preliminary Travel Plan (Appendix F)

Independent Stage 1 Road Safety Audit (Appendix G)
Bus/Dart Capacity & Demand Report (Appendix H)
Parking Management/Strategy Report (Appendix I)

4. Details of a Green Infrastructure Plan, Landscaping Plan, Arboriculture Drawings, and Engineering Plans that take account of one another.

Response:

A *Landscape Design Statement* and set of Landscape Plans prepared by NMP in conjunction with HJL are submitted with the application. The report includes analysis of how the proposal ties into the existing green infrastructure network in Bray.

The engineering drawings prepared by CHC have been prepared in conjunction with the landscape proposals.

As there are no trees on site, no arboriculture drawings are submitted.

5. Justification of quantum and quality of open space provision, both communal and public open space (POS). Clarity with regard to change in levels, compliance with Development Plan standards and planting details.

Response:

Communal Open Space

The quality of communal open space is described in the *Landscape Design Report* and associated drawings. The scheme is designed to provide a series of linked high-quality amenity spaces, each with a distinctive character and function. The spaces include a central amenity podium, gardens to the north and south as well as perimeter walkways with play equipment and exercise stations.

In terms of compliance with *Sustainable Urban Housing: Design Standards for New Apartments* (December 2020), the scheme generates a minimum requirement for 937m² of communal open space¹.

¹ 33 no. 1-bed x 5m² = 165m²; 91 no. 2-bed x 7m² = 637m²; 15 no. 3-bed x 9m² = 135m²; Total = 937m²

The quantum of communal amenity space is calculated based on the central podium space and the two communal gardens, which have a combined area of 1,599m². This does not include other spaces described in the landscape plan, which will further contribute to the amenity of the development.

In terms of Development Plan standards, the *Wicklow County Development Plan 2016-2022* requires that:-

Within apartment developments, private and communal amenity space shall be provided in accordance with Sustainable Urban Housing: Design Standards for New Apartments: Guidelines for planning authorities (Appendix 1 Development & Design Standards, pg. 11).

In this regard the proposal scheme is compliant with Development Plan standards.

Public Open Space

The site is located within walking distance of public parks (including People's Park) and Bray Promenade. It is noted that the *Wicklow County Development Plan 2016-2022* acknowledges that public open space is not always necessary in town centre locations:-

The need to provide public open space in town centre developments may be waived if the development specifically achieves other overriding aims of this Plan, particularly where public amenity space such as a town park or beach is in close proximity (Appendix 1 Development & Design Standards, pg. 11).

The proposed development achieves the overriding objective of providing a high-density mixed-use scheme on a prominent, vacant redevelopment site. Furthermore, the proposal will greatly enhance the public realm along Castle Street with hard and soft landscaping, with a community building facing a plaza accessed by foot and cycle from Castle Street.

Change in Levels

The NMP landscape drawings include 15 sections at different locations throughout the scheme. Please refer to NMP Drawing Nos. L1-800 to L1-805 inclusive.

The HJL architectural package also includes 8 site sections demonstrating changes in levels. See HJL Drawings Nos. CSB-HJL-AB-ZZ-DR-A-3011 and CSB-HJL-AB-ZZ-DR-A-3012.

Planting Details

The NMP landscape package includes a planting schedule and planting details (Drawing Nos. L1-907 and L1-908).

6. A Daylight and Shadow Impact Assessment of the proposed development, specifically with regard to:

(i) Impact upon adequate daylight and sunlight for individual units, public open space, courtyards, communal areas, private amenity spaces and balconies.

(ii) Impact to any neighbouring properties.

Response:

The application is supported by a *Daylight & Sunlight Analysis* prepared by IN2 Consulting, which provides a comprehensive assessment of the proposed apartments, amenity spaces and adjoining residential properties.

7. Assessment of impact upon the amenity of the surrounding properties, which should include an assessment of loss of light, overshadowing, overlooking, loss of privacy, potential overbearing impact and visual impact. Any identified impacts should be justified and mitigated against.

Response:

The IN2 *Daylight & Sunlight Analysis* provides a detailed assessment of impacts on light to adjoining properties.

The HJL *Architectural Design Statement* explains how the scheme was designed to respond to the surrounding context, in particular the dwellings on Dwyer Park. A number of measures to mitigate potential overlooking are described and illustrated on pages 37 and 38 of the document – through scheme design, height graduation, screened private balconies/opaque glazing where indicated, screened podium and landscape.

8. A report on surface water drainage, surface water management strategy and flood risk which deals specifically with quality of surface water discharge.

Response:

The CHC *Engineering Services Report* includes details on surface water drainage and management. The strategy is designed to ensure the highest possible standard of surface water quality.


A *Site Specific Flood Risk Assessment*, likewise prepared by CHC, is also submitted with the application.

9. A full response to matters raised within the PA Opinion and appended internal department reports submitted to ABP on the 03.11.2021.

Response:

The matters raised in the PA Opinion are summarised in the table below, with an associated response to each item.

Matter Raised:	Response:
<p><i>Density & Typology</i> The proposed density is in accordance with the Bray MD LAP and is in line with government policy to support high densities on urban infill and brownfield sites.</p> <p>Having regard to the size and constraints of the infill/ brownfield site; its location within Bray Town Centre, c. 900 metres from Bray Dart Station, and adjoining high frequency urban bus services; its town centre and high-density residential zoning; its accessibility to local shops and services, schools, and community facilities; and the OP2 objectives of the Bray MD LAP; it is considered that the site is suitable for a high-density mixed-use scheme.</p> <p>The PA considers that the overall approach taken for the development of the site is generally acceptable. Any application should justify how all of the OP2 objectives of the Bray MD LAP are met.</p>	<p>The applicant welcomes the positive assessment of the Planning Authority.</p> <p>The SCA <i>Planning Context Report & Statement of Consistency</i> sets out how the OP2 objectives are met.</p>
<p><i>Mix</i> This submitted mix is considered to be generally acceptable. Apartments shall be required to meet the development standards as set out in Sustainable Urban Housing: Design Standards for New Apartments - Guidelines for Planning Authorities 2020</p>	<p>The proposed apartments are fully compliant with the relevant Guidelines, as demonstrated in the Housing Quality Assessment submitted with the application.</p>
<p><i>General Design/Layout/Open Space</i></p>	

<p>The proposed building heights are in excess of the Bray MD LAP requirements. The submitted Material Contravention Statement is noted, this should be submitted at full application stage.</p> <p>The applicant should implement measures to ensure Dwyer Park will not be used as a creche drop-off.</p> <p>The Planning Authority has no significant objection to the general layout and design of the proposals. The development generally accords with the 'OP2 former Heaton Buckley's, Dublin Road' objectives as set out in the Bray MD LAP.</p> <p>The applicant should indicate that adequate usable public and communal open space is provided throughout the site in accordance with the relevant standards.</p>	<p>The <i>Material Contravention Statement</i> is submitted with the application.</p> <p>The pedestrian access from Dwyer Park will be fob or keypad controlled, facilitating residential access only. As such it will not be available to occasional car drop offs to the creche. This will be monitored and controlled by the Management Company.</p> <p>The applicant welcomes the positive assessment of the Planning Authority.</p> <p>A response to this topic is provided in response to Item 5 above.</p>
<p><i>Access and Permeability</i></p> <p>It is essential that indicative possible future pedestrian and cycling connections are shown to link the proposed development with the proposed SAR Road and the OP3 Former Everest Centre, Dublin Road site. The provision of these links are important in the interests of promoting pedestrian permeability. Considering the proposal put forward for a high-density development with reduced parking, there is a particular need to ensure that the development is a cohesive scheme that can deliver enhanced permeability and links to the surrounding area.</p> <p>A future <u>public</u> pedestrian and cycling connection should be shown to link Dwyer Park to the rear of the site with the proposed SAR Road. Details of boundary treatments should be shown to indicate that a public pedestrian and cycle connection will be developed in the future once the proposed SAR Road is complete.</p> <p>The comments raised in the Bray MDE Report should be noted and the location of the proposed vehicular entrance should be sufficiently justified.</p>	<p>The north-eastern part of the site has been redesigned to address the requirements of the Planning Authority for a future public connection to the proposed SAR road. The revised layout provides a separate pedestrian and cycle link extending from Dwyer Park to the SAR, annotated by the number 7 in the extract from the Landscape Masterplan below.</p>  <p>Propopsed Boundary treatments are shown on NMP Drawing No. L1-102.</p> <p>A potential link to the OP3 Former Everest site is indicated on the Circulation Strategy diagrams in both the <i>Landscape Design Report</i> (pg. 16) and the <i>Architectural Design Statement</i> (pg. 31).</p> <p>The comments raised in the Bray MDE Report are comprehensively addressed in Section 3.2 of the <i>CHC Engineering Planning Report</i>, which provides a robust justification for the proposed location of the</p>

<p>The comments raised in the Roads Report should be addressed.</p>	<p>vehicular entrance.</p> <p>Please refer to Appendix 1 of this document for responses to comments made by Transportation, Water & Emergency Services.</p>
<p><i>Car Parking</i></p> <p>The Planning Authority considers that this scheme is suitable for reduced parking. A Parking Demand Report should be submitted to support the parking provision based on the location in proximity and availability of public transport etc.</p> <p>The comments raised in the Roads Report should be addressed.</p>	<p>A <i>Parking Management/Strategy Report</i> is included as Appendix I of the <i>NRB Transportation Assessment Report</i>.</p> <p>Please refer to Appendix 1 of this document for responses to comments made by Transportation, Water & Emergency Services.</p>
<p><i>Cycle Parking</i></p> <p>All cycle facilities should be easily accessible and secure.</p> <p>The comments raised in the Roads Report should be addressed.</p>	<p>The secure bicycle store is easily accessible from the main pedestrian access route and from the Block A entrance lobby.</p> <p>Please refer to Appendix 1 of this document for responses to comments made by Transportation, Water & Emergency Services.</p>
<p><i>Childcare Facilities</i></p> <p>Excluding 1-bedroom apartments, the development of 106 units would require 28 spaces. Therefore, the proposed creche has sufficient capacity to provide for the needs of the development.</p> <p>It is recommended that Wicklow County Childcare Committee is consulted.</p>	<p>The proposed mix of units and capacity of the creche remains the same as that which was assessed at Pre-Application Consultation stage.</p> <p>Wicklow Childcare Committee has been notified of the application in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016.</p>
<p><i>Boundary Treatments</i></p> <p>Additional information is required regarding the proposed boundary treatments. The submitted "Proposed Boundary Layout" drawing prepared by NMP does not include all boundaries. The applicant should justify the retention of the existing up to 6 metre high boundary walls as they are likely to have an overbearing impact when viewed from the open space. A reduction in the height of these boundary walls may be more appropriate.</p>	<p>All Existing and Proposed boundaries are shown on NMP Drawing Nos. L1-101 and L1-102.</p> <p>The revised drawings clarify that existing walls to be retained are up to 4m in height.</p>
<p><i>Services</i></p> <p>Final design details of the proposed surface water discharge to the River Dargle should be agreed with WCC.</p> <p>The applicant should justify why green roofs are not incorporated on all of the apartment buildings.</p>	<p>A condition requiring agreement of final design details with Wicklow County Council would be welcomed by the applicant.</p> <p>The proposal has been revised to incorporate green roofs on all of the roofs. The extent of green roofs is shown on CHC Drawing No. CHC-00-GR-DR-C-00400 titled '<i>Drainage Catchment Areas Layout</i>'.</p>
<p><i>Part V</i></p>	

<p>The comments of the Housing Section should be noted.</p>	<p>The comments of the Housing Section have been noted. The specific requirements of the Housing Section will be addressed as part of the overall Part V agreement.</p>
<p><i>Archaeology</i> It is considered that further investigations should be undertaken and an assessment undertaken prior to submission of any application.</p> <p>Strategies for the management of any archaeological remains should be in conjunction with the Department of Housing, Local Government and Heritage. Should 'in situ' preservation be required, this would have implications for the development strategy.</p>	<p>Test trenches were excavated under license in February 2022. The results are described in the <i>Archaeological Impact Assessment</i> prepared by Shanarc Archaeology.</p>
<p><i>Bats</i> All mitigation measures outlined in the Bat Assessment should be incorporated into the proposed development.</p>	<p>The applicant is committed to implementing all mitigation measures contained in the Bat Assessment.</p>
<p><i>Storage Areas</i> The applicant should show that the Guidelines are complied with.</p>	<p>An updated Housing Quality Assessment is included in the <i>HJL Architectural Design Statement</i>. Where storage is provided in bedrooms and living rooms, the areas are in addition to minimum aggregate floor areas.</p> <p>The storage areas for each unit type are outlined in red on the HJL unit type drawings (Drawing Nos. CSB-HJL-AB-XX-DR-A-1201; CSB-HJL-AB-XX-DR-A-1202 & CSB-HJL-AB-XX-DR-A-1203).</p>
<p><i>Impact on Amenity of Surrounding Properties</i> Impact on the amenity of the surrounding properties should be assessed which should include an assessment of loss of light, overshadowing, overlooking, loss of privacy, potential overbearing impact and visual impact. Any identified impacts should be justified and mitigated against.</p>	<p>Please refer to the earlier response to Item 7 of the ABP Opinion.</p>
<p><i>Flooding</i> The planning authority is generally satisfied with the submitted Site Specific Flood Risk Assessment prepared by Corrigan Hodnett Consulting. This should be included with the full application.</p>	<p>The <i>CHC Site Specific Flood Risk Assessment</i> is submitted with the application.</p>
<p><i>Water & Environmental Services Report</i> Following examination of the documents submitted no issues have been identified.</p>	<p>Noted.</p>

10. Where an EIAR is not being submitted the applicant should submit all necessary information referred to in article 299B(1)(b)(ii)(II) and article 299B(1)(c) of the Planning and Development Regulations 2001-2018 for the purposes of EIAR screening.

Response:

A Statement in accordance with Article 299B(1)(b)(ii)(II)(C) of the Planning and Development Regulations 2001, as amended prepared by Enviroguide Consulting is enclosed with the application.

11. An up-to-date Ecological Impact Assessment, inclusive of a Bat Survey.

Response:

An up-to-date *Ecological Impact Assessment Report*, inclusive of a *Bat Survey Report*, prepared by Enviroguide Consulting and Dr. Tina Aughney, is submitted with the application.

12. An AA screening report which considers potential impacts on the Qualifying Interests of any Natura 2000 site.

Response:

An *Appropriate Assessment Screening Report* prepared by Enviroguide Consulting is submitted with the application.

13. A life cycle report shall be submitted in accordance with section 6.13 of the Sustainable Urban housing: Design Standards for New Apartments (2020). The report should have regard to the long-term management and maintenance of the proposed development. The applicant should consider the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, child friendly spaces, pathways, and all boundary treatments. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development.

Response:

A Building Lifecycle Report, prepared by Aramark, is submitted with the application.

14. A site layout plan indicating what areas, if any, are to be taken in charge by the planning authority.

Response:

Refer to CHC Drawing No. CHC-XX-XX-DR-C-00500 titled 'Taking in charge'.

15. Site Specific Construction and Demolition Waste Management Plan.

Response:

An *Outline Construction & Demolition Waste Management Plan*, prepared by CHC is submitted with the application.

16. Details of public lighting

Response:

Details of public lighting are provided on MCE Drawing Nos. EO40 and E041 and in the *External Lighting Report* and *Outdoor Lighting Report*.

Appendix 1

Response to Transportation, Water & Emergency Services (TWES) Report

As part of the Wicklow County Council assessment of the submitted preplanning documentation for the scheme, Declan O'Brien (Executive Engineer, Transport Water and Environmental Services) identified a number of observations which are required to be addressed as part of the final planning application submission. The observations are detailed in the following pages in italicised text with the responses/clarifications after each respective observation. The heading and numbering of the items is as per Mr. O'Brien's nomenclature.

The responses to items relating to Public Transport; Roads; Transport Assessment; Road Safety Audit; Parking Facilities were prepared by Corrigan Hodnett Consulting Engineers.

Pedestrian Facilities

Ped1. It is noted in the landscaping drawings that the footpaths around the perimeter of the development are to be "compacted gravel paths", the applicant should confirm that these are suitable for use by people with a disability.

Response:

NMP Landscape Architects have confirmed that the proposed footpath material is suitable for universal access purposes.

Cycle Facilities

CYC2. Point of clarification, Section 2.27 of the Transport Assessment Report should this read - 330 spaces instead of 340 spaces (260 residential and 70 visitors)?

Response:

The NRB *Transportation Assessment Report* has been updated to reflect the 330 cycle spaces proposed.

Public Transport Facilities

PT1. It is noted that the applicant has submitted details that would appear to demonstrate that bus connects can be accommodated in the future. The applicant should give assurances that the land for bus connects would be forthcoming and that the works proposed in the vicinity of the Regional Road in the short to medium term will not interfere with the delivery of Bus Connects.

Response:

This observation is addressed under Section 3.3 of the *Engineering Services Report*. Confirmation that the scheme accommodates the requirement for the future road corridor widening to facilitate Bus Connects from Jacobs Consulting Engineers is included under Appendix C.2. It is also discussed under Section 3.2, Pg. 23. The Bus Connects can be accommodated with the scheme design as currently proposed and the building setback has been calculated based on the corridor required to facilitate the Bus Connects Scheme. Details of the future scenario, with the Bus Connects in place are shown on CHC Drawing No. CHC-XX-XX-DR-C-00016 titled 'Site Entrance Layout for Future Bus Connects Route'.

It is confirmed that the land required to facilitate the Bus Connects scheme will be forthcoming and the works proposed to the area forward of the building line will not interfere with the delivery of the Bus Connects.

Roads

R1. It is noted that a swept path analysis was conducted for a fire appliance accessing the development (CHC-00-GR-DR-C-00101) however on the landscape drawing a swept path appears of drawing LI-101 which appears to show the swept path of the vehicle encroaching in the neighbouring property at the Dwyer Park access point. It is also noted that the proposed landscaping appears to encroach into area to allow a fire tender to manoeuvre. Please address this anomaly.

Response:

The swept path details have been removed from the landscape drawing. Swept path analysis is shown on CHC Drawing No. CHC-00-GR-DR-C-00101 titled 'Vehicle swept path analysis'.

R2. Confirmation is required that no right turn facilities are proposed for vehicles entering the development. Drawing in Appendix A of the Transport Assessment appears to show a Right Turn Lane whereas the engineer drawing (CHC-00-GR-DR-C-00015) appear to show something different. Please address this anomaly and clearly state the form of access arrangement is proposed. Any changes to the road marking and signage on the public road should be indicated on a drawing.

Response:

There is no right turn lane or filter proposed. The access into the development will take the form of a simple crossover access with a section of the ghost island omitted to permit vehicles turning right into the development to cross the ghost island. Based on the development generated traffic volumes in a heavily urbanised setting the transport assessment shows that the simple junction as proposed is sufficient and minimises impact on the existing street.

Appendix A of the NRB *Transportation Assessment Report* has been updated to include the current proposals. Details of the proposed changes to the existing road markings are shown on CHC Drawing No. CHC-XX-XX-DR-C-00017 titled 'Proposed road markings, signage and changes to existing road markings'.

R3. If the applicant is proposing measures in drawing CHC-00-GR-DR-C-00015 they should demonstrate how this arrangement will operate having regard to the right turning lane into the shopping centre.

Response:

The right turn lane into the shopping centre will be shortened by c.2.73 metres to facilitate cars accessing the development crossing over this section of ghost island/shopping centre right turn lane. Full details of the amendments to the existing road markings are shown CHC Drawing No. CHC-XX-XX-DR-C-00017 titled 'Proposed road markings, signage

and changes to existing road markings'. It is considered that the reduction in the length of the right turn lane by less than half the length of a queuing car space is nominal and will have negligible impact on the operation or throughput capacity of the existing right turn lane.

R4. It is noted that the applicant is proposing a recessed loading bay/parking bay on O'Dwyer Park to allow refuse collection. Details should be submitted on how this will operate during refuse pick up times in the event that the space is occupied by parked vehicles (It is my understanding that this location is already subject to paid parking bye-laws – Bray MD can confirm)

Response:

The refuse collection is intended to be kerbside from a new recessed loading bay to be located on Dwyer Park adjacent to the development. This will involve removal of a section of street parking which is c.11.8metres long (2no. spaces) and reverting this section to a semi-recessed loading bay (1.4 metre recess) which it was previously. Note also that the existing dwellings in Dwyer Park are serviced for refuse collection under the current scenario. In the event that the reversion of the parking bays to a loading bay is not acceptable or if it is occupied during bin collection, refuse vehicles can still operate as per the existing regime.

R5. It is the understanding the Bray Municipal District have plans to introduced pedestrian facilities on Castle Street in the vicinity of the proposed development entrance. The applicant should have regard to this.

Response:

The Bray Municipal Engineer has confirmed that the Bus Connects design will take precedence over any other proposals. Jacobs Consulting Engineers are the Bus Connects designers appointed by the National Transport Authority to carry out the detailed design of the Bus Connects routh through Castle Street and they have confirmed that the current proposals are acceptable and tie-in with the Jacobs Consulting Engineers designs. Details of their confirmation is outlined in Section 3.3 of the *Engineering Services Report*.

R6. *Further details should be provided on the proposed vehicular crossover as mentioned in the section 3.2 of the engineer's service report.*

Response:

Full details are included in Section 3.2 and shown in Figure 3.6 of the *Engineering Services Report*.

R7. *Road construction details (road make up, typical cross sections etc.) should be submitted for the vehicular access as it crosses the footpath. It is noted that "high quality paving" is proposed (on landscape drawings). The design of such paving should be so that it will not result in long term maintenance issues or result in an uneven surface that could lead to trips and falls.*

Response:

Road construction details are shown on CHC Drawing No. CHC-XX-XX-DR-C-00101 titled 'Entrance / Crossover details'.

R78. *Road marking and signage details should be submitted for all modes of transport, particularly at the vehicular access to the development.*

Response:

Full details of the amendments to the existing road markings are shown CHC Drawing No. CHC-XX-XX-DR-C-00017 titled 'Proposed road markings, signage and changes to existing road markings'.

Transport Assessment/Traffic Impact Assessment

TA1. *Noted the transport assessment has indicated that the receiving road network on the approaches to the development has adequate capacity. However the applicant should carry out an assessment of the new development junction (incorporating the shopping centre access) demonstrating the impact that the proposed development will have on the road network at this location. It appears to have been overlooked in the transport assessment.*

Response:

The NRB *Transportation Assessment Report* has been amended to include PiCADY analysis of the site access junction. In opening year (2024) and design year (2034) the analysis shows that queues of less than one vehicle is anticipated to be generated in both AM and PM peaks.

Road Safety Audit

RSA1. A Stage 1 Road Safety Audit should be carried out and included in any application. Any issues that were found and accepted by the designer should then be incorporated into the design.

Response:

The Stage 1 Road Safety Audit is included in Appendix G of the NRB *Transportation Assessment Report*. All recommendation identified in the feedback form have been accepted and incorporated into the current design proposals.

Public Lighting

PL1. Noted the submission on the proposed lighting for the development, however there a few items to note:

It is not envisaged that any of the lighting as currently proposed will be taken in charge by the Council.

The applicant should review the existing public lighting along the public road at the proposed vehicular entrance and at the refuse collection point and if there is any deficiencies in lighting levels the applicant shall propose mitigation measures.

Those details are to be agreed with the public lighting section of Wicklow County Council.

Response:

The public lighting indicated on the MCE external lighting drawings is not intended to be taken in charge by the Council. Final details may be agreed with the public lighting section of Wicklow County Council and a condition of that nature would be welcomed by the applicant.

Parking Facilities

PK2. It is noted that it is the applicant intention to duct all car parking spaces for EV charging but it is also noted that they plan to retro-fit EV Charging points. It is considered that some of the spaces should be capable of charging EV vehicles from day of opening of the development (if granted); this is to promote the change to more environment friendly vehicles.

Response:

Ten percent of the car parking spaces proposed are capable of EV charging from day of opening. The remainder of the spaces can be changed to EV parking spaces easily as electricity supply duction is to be installed to service the spaces which will minimise works required to install charging points at a later date.

PK3. It should be noted that the engineering service report infers that 10% of the parking spaces with benefit from charging points. Please address the anomaly between this report and the transport assessment.

Response:

Section 2.17 of the NRB Transportation Assessment Report states:-

‘Car parking spaces provided can easily be upgraded to allow conversion for Electric Vehicles. In the case of residential apartment development of the nature proposed, with specific spaces likely dedicated to specific apartments, it is considered appropriate to facilitate the retro-fitting of spaces, based on demand following occupation, rather than a % of spaces being defined as such and provided from the outset’.

Other

O1. If applicable, a proposed TIC map should accompany any application.

Response:

Refer to CHC Drawing No. CHC-XX-XX-DR-C-00500 titled ‘Taking in charge’ which is also referenced in the *Engineering Service Report* under Page37.